

**REMARKS**

This response is submitted in response to the Final Office Action dated October 17, 2007. Claims 1 and 41 are amended to improve wording. Claim 7 is amended to correct a clerical error. No new matter is added. Claims 1-4 and 6-59 are active for examination.

The Office Action rejected claims 1-4 and 6-59 under 35 U.S.C. §102(e) as being anticipated by Yaung et al. (U.S. Patent No. 6,446,069). Claim 7 is objected to for minor formality. The rejection is respectfully overcome and the objection is addressed in view of the amendments and/or remarks presented herein.

An exemplary system according to claim 1 interfaces between a plurality of software applications and a plurality of users. In response to an input from one of the users to a particular one of the software applications, the exemplary system provides instructions to the particular software application regarding entitlements of the one of the plurality of users to access a particular function of the particular software application. The exemplary system includes a **memory that stores data specifically identifying and keeping record of hierarchically arranged functions associated with each software application. An entitlement of the one of the plurality of users to one of the hierarchically arranged functions automatically applies to functions that are hierarchically subordinate to the one of the plurality of hierarchically arranged functions, according to the respective first data stored in the first memory.**

In supporting the rejection of claim 1 based on Yaung, the Office Action cited col. 7, line 35 to line 59 to be corresponding to the claimed feature “the respective first data for each software application includes an identification of hierarchically arranged functions associated with that software application.” This reliance is misplaced.

The cited paragraph states:

For example, the input data for the application-specific definition vector (DV) received in block 200 generally takes the form  $DV = \langle P_1, P_2, P_3, \dots, P_n \rangle$ , where  $P_i$  is a unique privilege (i.e.,  $P_i = P_j$  if and only if  $i = j$ ). An application developer determines the extent of access control for the application program by defining this definition vector which is specific to each application. Advantageously, the access control system allows each application program to define its privileges using this application-specific definition vector. Each defined privilege corresponds to a certain type of function to be performed with a pre-determined type of data item in the digital library. As will be discussed, only a user utilizing the application who is associated with the privilege can thereby gain access to the function and perform the function on the data item.

The language of the cited paragraph only describes that an application-specific definition vector (DV) is provided to define each application's privileges. However, as described in the cited paragraph these DVs are used to define how a USER can access a specific application ("Each defined privilege corresponds to a certain type of function to be performed with a pre-determined type of data item in the digital library. As will be discussed, only a user utilizing the application who is associated with the privilege can thereby gain access to the function and perform the function on the data item.") Apparently, the stored DV is used to define how a user can access an application, has nothing to do with identifying and keeping track of hierarchically arranged functions associated with each software application. Accordingly, Young fails to disclose that "the first memory stores the respective first data for each software application including an identification of hierarchically arranged functions associated with that software application," as described in claim 1.

Furthermore, Applicants are puzzled by the Office Action's assertion that col. 9, line 26 to col. 10, line 12 of Young purportedly meets the claimed limitation "an entitlement of the one of the plurality of users to one of the hierarchically arranged functions automatically applies to functions that are hierarchically subordinate to the one of the plurality of hierarchically arranged functions, according to the respective data stored in the first memory." In supporting this assertion, the Office Action contends:

“[t]he system of cited prior art teaches system that relates to user access control method that involves restricting access by users to functions based on whether user has been associated with application privilege for function by using an extensible application-specific access control model, and an Object-Oriented Application Program Interface (API) design implementing the model. The extensible application-specific access control model allows each application program to define its privileges using an extensible application privilege vector within the digital library.”

See page 3, second paragraph of the Office Action.

Again, the Examiner’s arguments appear to be made along the line that Yaung describes a system that allows each application program to define its privilege using an extensible application privilege vector. While Yaung allows control of user’s access to an application, Yaung’s disclosure is silent whether an entitlement of a user to a hierarchically arranged functions should be automatically apply to functions that are hierarchically subordinate to the hierarchically arranged functions, let alone performing such feature according to the respective first data stored in the first memory. Accordingly, Yaung’s system does not meet claim limitation that “an entitlement of the one of the plurality of users to one of the hierarchically arranged functions automatically applies to functions that are hierarchically subordinate to the one of the plurality of hierarchically arranged functions, according to the respective first data stored in the first memory,” as described in claim 1.

As Yaung fails to meet every limitation of claim 1, Yaung cannot support a prima facie case of anticipation. Accordingly, the anticipation rejection of claim is overcome. Favorable reconsideration of claim 1 is respectfully solicited.

Claim 41 includes language comparable to that of claim 1. Accordingly, claim 41 is patentable over Yaung for at least the same reasons as for claim 1.

Claims 1-4 and 6-59, directly or indirectly, depend on claim 1 and incorporate every limitation thereof. Consequently, claims 1-4 and 6-59 are patentable over Yaung by virtue of their dependencies.

### **CONCLUSION**

Applicants believe that this application is in condition for allowance, and request that the Examiner give the application favorable reconsideration and permit it to issue as a patent. If the Examiner believes that the application can be put in even better condition for allowance, the Examiner is invited to contact Applicants' representatives listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP



Wei-Chen Nicholas Chen  
Registration No. 56,665

600 13<sup>th</sup> Street, N.W.  
Washington, DC 20005-3096  
Phone: 202.756.8000 WC:MWE  
Facsimile: 202.756.8087  
**Date: October 31, 2007**

**Please recognize our Customer No. 20277  
as our correspondence address.**